

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products
Liability Litigation

MDL NO. 2:15-md-02641-PHX-DGC

**STIPULATION OF DISMISSAL
WITH PREJUDICE**

This document relates to the cases listed
on the Exhibit attached hereto.

STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully submitted this 13th day of November, 2020.

s/Wendy R. Fleishman
Wendy R. Fleishman
WFleishman@LCHB.com
LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: (212) 355-9500
Facsimile: (212) 355-9592

Attorney for Plaintiffs

s/Richard B. North, Jr.
Richard B. North, Jr.
richard.north@nelsonmullins.com
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th St. NW, Ste. 1700
Atlanta, GA 30363
P: 404.322.6000
F: 404.332.6397

*Attorneys for Defendants C. R. Bard, Inc.
and Bard Peripheral Vascular Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Wendy R. Fleishman
Wendy R. Fleishman